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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

v.

NATHAN FOREMAN,

Defendant.

Case No. 2:23-cr-00105-GMN-EJY

**STIPULATION TO CONTINUE
MOTION RESPONSE AND REPLY
DEADLINES**

It is hereby stipulated and agreed, by and between Jason M. Frierson, United States Attorney, through Afroza Yeasmin, Assistant United States Attorney, representing the United States of America, and Benjamin Nemec, Esq., representing Defendant Nathan Foreman, that the government's deadline to respond to the defendant's motion to compel (ECF No. 25) is extended to April 5, 2024 and that the defendant's deadline to reply to the government's response is extended to April 19, 2024.

This Stipulation is entered into for the following reasons:

1. The defendant filed a motion to compel discovery (ECF No. 25) on February 26, 2024. The docket entry indicated that the government's response would be due on March 11, 2022, in accordance with LCR 12-1(a)(2). Pursuant to LCR 12-1(a)(3), defendant's reply would be due March 18, 2024.

2. The government requests additional time to respond to the defendant's motion. Counsel for the government is conferring with an expert and needs additional time to receive necessary information to provide a complete response to the instant motion filed by defendant.

3. The defendant is not incarcerated and does not object to this stipulation.

4. The parties agree to the extension of the motion deadlines.

5. The additional time requested herein is not sought for purposes of delay, but merely to allow counsel sufficient time to effectively and completely respond to defendant's motion to compel discovery.

6. Additionally, denial of this request for continuance could result in a miscarriage of justice. The additional time requested by this Stipulation is excludable in computing the time within which the trial herein must commence pursuant to the Speedy Trial Act, Title 18, United States Code, Section 3161(h)(7)(A), considering the factors under Title 18, United States Code, Section 3161(h)(7)(B)(i), (iv).

This is the fourth stipulation to continue filed herein.

DATED this 1st day of March, 2024

JASON M. FRIERSON
United States Attorney

By: /s/ Afroza Yeasmin
AFROZA YEASMIN
Assistant United States Attorney

By: /s/ Benjamin Nemec
BENJAMIN NEMEC, ESQ.
Counsel for Defendant Nathan Foreman

1 UNITED STATES DISTRICT COURT
2 DISTRICT OF NEVADA

3 UNITED STATES OF AMERICA,

4 Plaintiff,

5 v.

6 NATHAN FOREMAN,

7 Defendant.

Case No. 2:23-cr-00105-GMN-EJY

ORDER

8 Based on the pending Stipulation between the government and defense, and good
9 cause appearing therefore, IT IS HEREBY ORDERED that government's deadline to
10 respond to defendant's motion to compel (ECF No. 25) is extended to April 5, 2024, that
11 the defendant's deadline to reply to the government's response is extended to April 12,
12 2024.

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14 DATED this 1st day of March 2024.

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17 THE HONORABLE ELAYNA J. YOUCHAH
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